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**VIA ECF AND ELECTRONIC MAIL**

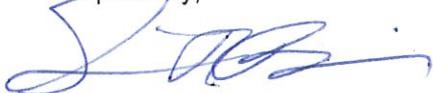
The Honorable Katherine Polk Failla  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Petróleos de Venezuela, S.A., et al. v. MUFG Union Bank, N.A., et. al., Case No. 1:19-cv-10023-KPF (S.D.N.Y.)*

Dear Judge Failla,

We are writing to report that the parties are very close to reaching final agreement on a schedule and a forbearance and expect to have an agreement in place within the next few hours. Accordingly, the parties respectfully request that the Court withhold its ruling pending further update, which we will provide no later than 4:00 this afternoon.

Respectfully,



James R. Bliss  
of PAUL HASTINGS LLP

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